

JEROME JUNIOR WASHINGTON  
PLAINTIFF  
C.O. COLGAN et al,  
DEFENDANTS

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MAR 15 2018

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

PRISONERS COMPLAINT FORM  
42 U.S.C. § 1983 AND 28 U.S.C.  
§ 1331 (a) TO OBTAIN RELIEF FROM  
VIOLATION OF FEDERAL LAWS BY  
DEMANDED FOR JURY TRIAL  
JURISDICTION

INTRODUCTION

JURISDICTION

PLAINTIFF, JEROME JUNIOR WASHINGTON IS THE SWORN PRO-SE LITIGANT INTO THIS HEREBY VERIFIED TESTIMONY OR COMPLAINT. STATED AS FOLLOWS: FOR THE U.S. WESTERN DISTRICT OF PENNSYLVANIA TO HAVE JURISDICTION OVER THIS PRISONERS COMPLAINT FORM. PURSUANT UNDER THE UNITED STATES WESTERN DISTRICT 42 U.S.C. § 1983 AND 28 U.S.C. § 1331 (a) TO OBTAIN RELIEF FROM VIOLATIONS OF FEDERAL LAWS. TO THE VIOLATION OF PLAINTIFF 8th AND 14th AMENDMENT RIGHTS PURSUANT TO MALEFICIOUS AND SADISTIC ILL WILL OUT OF RETALIATION. TO VIOLATIONS OF THE PLAINTIFF CONSTITUTIONAL LAWS OF PRISONERS RIGHTS. TO BE FREE FROM CAUEL AND UNUSUAL PUNISHMENT. BY C.O. COLGAN INFAMY OF CUSTODY CONTROL WITH IRRATIONAL BRUTALITY. TO CONFLICT THE UNWONTON EXISTENCE OF PAIN AND SUFFERING THAT INFLECTED THE WONTON HARM FROM DEFENDANT C.O. COLGAN EXCESSIVE FORCE (DC-ADMOU1) ADMINISTRATIVE POLICY.

PARTIES; JURISDICTION AND VENUE

1) PLAINTIFF, JEROME JUNIOR WASHINGTON WAS CONFINED INSIDE THE SCI-GREENE PRISON, S.R.T.U GB UNIT MENTAL HEALTH PROGRAM, IN PITTSBURGH JAIL OR PENITENTIARY, STATE CORRECTIONAL INSTITUTIONS. LOCATION AT SCI-GREENE; 175 PROGRESS DRIVE, WAYNESBURG, PA 15370

2) PLAINTIFF IS AND WAS AT ALL TIMES MENTIONED HEREIN; AN ADULT CITIZEN OF THE UNITED STATES AND A RESIDENT OF THE STATE OF PITTSBURGH, PENNSYLVANIA

II. DEFENDANTS; JURISDICTION AND VENUE

3) DEFENDANT C.O. COLGAN IS AND WAS AT ALL RELEVANT TIMES HEREIN AN EMPLOYEE/GUARD OF THE PRISON S.R.T.U. GB UNIT PROGRAM; FOR SCI-GREENE MENTAL HEALTH PATIENTS INCLUDING PLAINTIFF.

4) DEFENDANT SUPERINTENDENT MR. GILMORE WAS AT ALL TIMES HEREIN SUPERINTENDENT OF THE SCI-GREENE; CORRECTIONAL INSTITUTIONS; AS THE WARDEN OF THE MUNICIPAL PRISON, FOR CITY OF PITTSBURGH. AS SUPERINTENDENT OF THE PRISON DEFENDANTS; MANAGES ITS DAY TO DAY OPERATIONS AND EXECUTES ITS POLICIES AT ALL RELEVANT TIMES HEREIN PLAINTIFF SRTU GB UNIT PROGRAM COMPLAINT.

5) DEFENDANTS CITY OF PITTSBURGH AND STATE OF PENNSYLVANIA IS AND WAS AT ALL RELEVANT TIMES HEREIN MUNICIPAL CORPORATION OF THE STATE OF PENNSYLVANIA...

6) THIS ACTION ARISES UNDER AND IS BROUGHT PURSUANT TO 42 U.S.C. SECTION 1983 TO REMEDY THE DEPRIVATION; UNDER COLOR OF STATE LAW; OF RIGHTS GUARANTEED BY THE EIGHTH AND FOURTEENTH AMENDMENTS TO THE UNITED STATES CONSTITUTION. THIS COURT HAS JURISDICTION OVER THIS ACTION PURSUANT TO 28 U.S.C. SECTION 1331 AND 1343.

7) PLAINTIFF'S CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE.

8) THIS CAUSE OF ACTION ARISE IN THE WESTERN DISTRICT OF PENNSYLVANIA. THEREFORE, VENUE IS PROPER UNDER 28 U.S.C. SECTION 1391 (a).

III. PREVIOUS LAWSUITS OF PLAINTIFF

9) THE PLAINTIFF HAS FILED OTHER LAWSUITS DEALING WITHEN THESE SAME FACTS INVOLVED INTO THIS ACTION OR COMPLAINT. OTHERWISE RELATING TO PLAINTIFF; JEROME JUNIOR WASHINGTON HVO282 IMPRISONMENT AT SCI-GREENE/175 PROGRESS DRIVE/WAYNESBURG, PA 15370

10) THE PLAINTIFF HEREIN HAS FILED THE BELOW SUITS OR INFORMATION AS ISSUED BELOW INTO THE BELIEF OF FILED CIVIL ACTION'S FEDERAL CASE NOTES OR SUITS INVOLVED INTO OTHER CIVIL ACTION'S CASE'S BELOW AS FOLLOWS FROM 1 out of 7.

A) HAVE YOU FILED OTHER LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS YES ☒ NO ☒

B) IF YOUR ANSWER TO (A) IS YES, DESCRIBE EACH LAWSUIT BY ANSWERING QUESTIONS 1 THROUGH 7 BELOW. (IF THERE IS MORE THAN ONE LAWSUIT DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER SHEET OF PAPER, USING THE SAME FORMAT.)

1) PARTIES: TO THE PREVIOUS LAWSUIT;  
PLAINTIFF: JEROME WASHINGTON  
DEFENDANT: CHRIS. ROZICH et al;

PAGE 2  
2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT NAME THE COUNTY, EASTERN DISTRICT COURT)  
3) DOCKET OR INDEX NUMBER: CIVIL DIVISION NO: 2:14-CV-05561-ER  
4) NAME OF JUDGE ASSIGNED TO YOUR CASE THE HONORABLE EDUARDO C. ROBRENO, J.  
5) APPROXIMATE DATE OF FILING LAWSUIT  
6) IS THE CASE STILL PENDING? YES ☒ NO ☒  
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ON AN HONORABLE ANSWER OR JUDGMENT OF THE JURISDICTION'S ORDERED ON THE CASE.  
C) HAVE YOU FILED LAWSUITS IN STATE OR FEDERAL COURT DEALING WITH THE SAME FACTS INVOLVED IN THIS YES ☒ NO ☒  
D) IF YOUR ANSWER TO (C) IS YES; DESCRIBE EACH LAWSUIT BY ANSWERING QUESTIONS 1 THROUGH 7 BELOW. (IF THERE IS MORE THAN ONE LAWSUIT DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER SHEET OF PAPER, USING THE SAME FORMAT.)  
E) 1) PARTIES: TO THE PREVIOUS LAWSUIT;  
PLAINTIFF: JEROME WASHINGTON  
DEFENDANT: MICHAEL WENEROWELTZ et al;  
2) COURT (IF FEDERAL COURT NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY: EASTERN DISTRICT COURT.  
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 15-4102  
4) NAME OF THE JUDGE ASSIGNED TO YOUR CASE THE HONORABLE EDUARDO C. ROBRENO, J.  
5) APPROXIMATE DATE OF FILING LAWSUIT  
6) IS THE CASE STILL PENDING? YES ☒ NO ☒  
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING FOR AN HONORABLE JUDGMENT FOR JUSTICE  
F) 1) PARTIES: TO THE PREVIOUS LAWSUIT;  
PLAINTIFF: JEROME WASHINGTON  
DEFENDANT: JOHN DOE et al;  
2) COURT (IF FEDERAL COURT, NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY: EASTERN DISTRICT COURT.  
3) DOCKET OR INDEX NUMBER: CIVIL DIVISION NO. 2:14-CV-05540-ER  
4) NAME OF JUDGE ASSIGNED TO YOUR CASE, THE HONORABLE EDUARDO C. ROBRENO, J.  
5) APPROXIMATE DATE OF FILING LAWSUIT  
6) IS THE CASE STILL PENDING? YES ☒ NO ☒  
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING  
G) 1) PARTIES: TO THE PREVIOUS  
PLAINTIFF: JEROME JUNIOR WASHINGTON  
DEFENDANT: TOM WOLF; et al.,  
2) COURT (IF FEDERAL COURT NAME THE DISTRICT, IF STATE COURT, NAME THE COUNTY: WESTERN DISTRICT COURT.  
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 2:16-CV-01714-LPL  
4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE MAGISTRATE JUDGE LISA Pupo LENIHAN  
5) APPROXIMATE DATE OF FILING LAWSUIT  
6) IS THE CASE STILL PENDING? YES ☒ NO ☒  
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE  
H) 1) PARTIES: TO THE PREVIOUS  
PLAINTIFF: JEROME WASHINGTON  
DEFENDANT: Supl. Hunt et al.,  
2) COURT (IF FEDERAL COURT NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY; MIDDLE DISTRICT COURT  
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO: 2:16-CV-1828

PAGE 3) 4) NAME OF THE JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE JOHN E. JONES III  
5) APPROXIMATE DATE OF FILING LAWSUIT: Case 2:18-cv-00341-JFC-LPL Document 7 Filed 04/13/18 Page 3 of 5  
6) IS THE CASE STILL PENDING? YES ☒ NO ☒  
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE  
4) 1) PARTIES: TO THE PREVIOUS  
PLAINTIFF: JEROME JUNIOR WASHINGTON  
DEFENDANT: SCI-GREATER FOOD SUPERINTENDENT MRS. LANK et al;  
2) COURT (IF FEDERAL COURT NAME THE DISTRICT; IF STATE COURT, NAME THE COUNTY; EASTERN DISTRICT COURT.  
3) DOCKET OR INDEX NUMBER: CIVIL ACTION NO. 16-3424  
4) NAME OF JUDGE ASSIGNED TO YOUR CASE; THE HONORABLE LUCY V. CHEN  
5) APPROXIMATE DATE OF FILING LAWSUIT  
6) IS THE CASE STILL PENDING? YES ☒ NO ☒  
7) WHAT WAS THE RESULT OF THE CASE? STILL PENDING ACTIVE

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES  
11) THE PLAINTIFF HEREBY TRIED TO EXHAUST ALL POSSIBLE REMEDIES THAT WAS OFFERED TO BE ALONG TO THE PLAINTIFF UPON SCI-GREENE DENIAL OF GRIEVANCE #687587 DECISION STATING: (THIS MATTER WAS INVESTIGATED AND REVIEWED BY A HIGHER AUTHORITY. THAT AUTHORITY (OSIE) DID CONCUR WITH THE FINDINGS OF THE VESTIGATION OF FILING TO PRISONERS LITIGATION ACT PRESUME HEREIN TO THE DETERMINATION OF FILING AT THE SAME TIME TRYING TO EXHAUSTION THE AVAILABLE GRIEVANCES; OFFERED TO PLAINTIFF BEING INDIGENT UNDER THE ADMINISTRATIVE DENIAL OF COPIES TO APPEAL TO THE FINAL STAGE OF/OR REMEDIES AS MOSELY EVERYDAY AN NEW VIOLATION OCCUR WERE TO AN NEW UNLAWFUL UNCONSTITUTIONAL VIOLATION UNDER 13.8.1 POLICY APPEAR TO EXIST MORE AGGRESSIVE AND EXCESSIVE ABUSE DISCRETION INTO ALONG-TERM ISOLATION INSIDE SCI-GREENE S.R.T.U.-GB UNIT PROGRAM FOR NO FREEDOM UNDER SLAVERY ABUSE OF CONTROL ELEMENTS OF ABUSIVE MEASURE OF AUTHORITY POWER OVER INMATES FOR CRUEL AND UNUSUAL PUNISHMENT THROUGHOUT AN CONTINUOUS ARGUABLE CLAIM OF BRUTALITY INFAMY OF/OR EVERYDAY STRUGGLES, PAINS AND SUFFERING UNDER THE MALICIOUS AND SADESTICAL ILL WILL FOR AN SUFFICIENT DANGEROUS SITUATIONS OF AN DAILY BASE OF HARM AND DAMAGES UPON LIFE THREATENING DANGEROUS SITUATIONS WERE OF UNLAWFUL HARDSHIP AS AN D-ROSTER SERIOUSLY MENTAL ILL PLAINTIFF WERE TO UNCONSTITUTIONS EXIST IT MAY DEPEND ON YOUR JURISDICTION TO SET THE SLAVES OR PRISONERS FREE FROM SCI-GREENE S.R.T.U.-GB UNIT PROGRAM CRUEL AND UNUSUAL PUNISHMENT. WHEREAS THE PLAINTIFF IS AN PRISONER THAT IS ASKING TO BE FREE BY THE GRANT TO THE DEMANDS OF AN JURY TRIAL. PRESUME TO A CONSTITUTIONAL VIOLATION AT LAW OF PLAINTIFF PRISONERS RIGHTS.

V. STATEMENT OF COMPLAINT "PERSONS" FOR PURPOSES OF 42  
12) AT ALL RELEVANT TIMES HEREIN, DEFENDANTS WERE "PERSONS" FOR PURPOSES OF 42 U.S.C. SECTION 1983 AND ACTED UNDER COLOR OF LAW TO DEPRIVE PLAINTIFF OF THEIR CONSTITUTIONAL RIGHTS, AS SET FORTH MORE FULLY BELOW.  
13) DEFENDANT C.O. COLGAN ON July 13, 2017 HAD CONTINUE TO CHOKER MR. WASHINGTON/PLAINTIFF.  
14) DEFENDANT C.O. COLGAN ON July 13, 2017 HAD CONTINUE TO HEADBUTT MR. WASHINGTON/PLAINTIFF IN THE FACE  
15) DEFENDANT C.O. COLGAN ON July 13, 2017 HAD CONTINUE TO ENFORCE HIS WEIGHT DOWNWARDS ON MR. WASHINGTON/PLAINTIFF BODY. WHYLL C.O. COLGAN AGGRESSIVELY TRY TO SNAPE MR. WASHINGTON/PLAINTIFF NECK CONTINUOUSLY!  
16) DEFENDANT C.O. COLGAN ON July 13, 2017 HAD SAID WORDS LIKE HE COULDN'T WAIT TO FUCK ME UP AND HAD CALLED ME/PLAINTIFF MANY BETCHES AND OTHER ABUSIVE NAMES. AS DEFENDANT C.O. COLGAN HAD BRUTALLY USED EXCESSIVE FORCE UNDER POLICY DC-ADM001. EXCESSIVE FORCE ALLEGATIONS..



PAGE 4) 17) DEFENDANT C.O. COLGAN HAD SAID WORDS LIKE STOP RESISTING CONTINUALLY TO COVER UP HIS ACTS OF EXCESSIVE FORCE AMONGST OTHER PRISON OFFICIALS. DEFENDANT C.O. COLGAN WAS THE AGGRESSIVE OFFICIAL OUT OF MANY PRISON OFFICIALS BEING PRESENT THROUGHOUT DEFENDANT C.O. COLGAN ABUSIVE ASSAULT ON JULY 13, 2017 DURING 2:00pm TO 4:00pm OF DEFENDANT C.O. COLGAN WORKING ASSIGNMENT HOURS OF 8:00AM TO 4:00PM SHIFT FOR THE SCI-GREENE S.R.T.U. PROGRAM.

18) DEFENDANT C.O. COLGAN HAD DEPRIVED AWAY NUMEROUS OF PLAINTIFF S.R.T.U. GB UNIT SHOWERS WHENEVER DEFENDANT C.O. COLGAN HAD FELT LIKE REFUSING THE PLAINTIFF SHOWERS.

19) DEFENDANT C.O. COLGAN DEPRIVE THE PLAINTIFF FOR HIS SHOWERS ON JUNE 2, 2017 FRIDAY BY PURPOSELY ~~PUT~~ BYPASSING THE PLAINTIFF IN 9 CELL ON GB UNIT BY STARTING AT GB 08 CELL THEN WENT TO GB 03 CELL.

20) PLAINTIFF WAS PUNCH BY C.O. COLGAN ON 6-13-17

21) PLAINTIFF WAS CHOKED BY C.O. COLGAN ON 6-13-17

22) PLAINTIFF WAS HEADBUTT BY C.O. COLGAN ON 6-13-17

23) PLAINTIFF FACE WAS SIAMMED OFF THE GROUND BY C.O. COLGAN ON 6-13-17

24) C.O. COLGAN TRIED SNAPPING THE PLAINTIFF NECK, ON 6-13-17

25) C.O. COLGAN HAD PUT THE WEIGHT OF HIS BODY DOWNWARD ON PLAINTIFF ON 6-13-17

26) C.O. COLGAN SAID WORDS LIKE HE COULDN'T WAIT TO FUCK ME UP (WHY'LL C.O. COLGAN PHYSICALLY BEAT THE PLAINTIFF BRUTALLY ON 6-13-17

27) C.O. COLGAN CALLED THE PLAINTIFF MANY BITCHES AND OTHER ABUSIVE WORDS (WHY'LL C.O. COLGAN EXCESSIVELY BEAT THE PLAINTIFF UP ON 6-13-17

28) DEFENDANT SUPERINTENDENT GILMORE IS HELD ACCOUNTABLE FOR THE SUPERVISOR RULE OVER SCI-GREENE PRISON OFFICIALS UNCONSTITUTIONAL VIOLATIONS AS THE WARDEN AND SUPERINTENDENT LIABILITY PROTECTION OVER INMATE AND PRISON OFFICIALS SAFETY CARE CUSTODY AND CONTROL.

29) DEFENDANT SUPERINTENDENT GILMORE IS HELD EQUIVALENT TO DEFENDANT C.O. COLGAN AS OVERALL SUPERVISORY THAT WAS INFORMED OR KNOW THE KNOWLEDGE OF SUCH ASSAULT BUT WAS WILLING TO TURN AN BLIND EYE TO THE SERIOUS OFFENCE OF EXCESSIVE FORCE ("DC-ADMOG1") POLICIES, PRACTICES AND PROCEDURAL LAW UNDER GILMORE SUPERVISION FOR CRUEL AND UNUSUAL PUNISHMENT

30) RELIEF AND INJUNCTION TO REMOVAL DEFENDANT AS FAR AWAY FROM ME AS POSSIBLE.

31) RELIEF AND INJUNCTION TO REMOVAL DEFENDANT FROM WORKING THE SRTU PROGRAM

32) RELIEF AND INJUNCTION TO REMOVAL DEFENDANT FROM WORKING THE SRTU PROGRAM THESE HAND CUFFS AND SHACKLES AND/OR TREAT THE SRTU LIKE AN MENTAL HEALTH PROGRAM INSTEAD OF ENSLAVERY

33) RELIEF AND INJUNCTION TO CONDUCT AN INVESTIGATION OF CAMERAS, INMATES AND ALL PERSONNEL OF THE SRTU PROGRAM TO SEE THE WRONG DOING IN THE SRTU PROGRAM.

VI. RELIEF

34) RELIEF PUNITIVE DAMAGES

35) RELIEF NORMAL DAMAGES

36) RELIEF COMPENSATION FOR PAIN AND SUFFERING

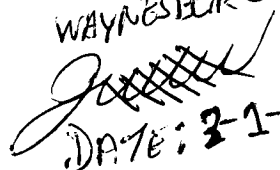
37) DEFENDANT Supt. GILMORE SUE IN HIS INDIVIDUAL CAPACITIES AND OFFICIAL CAPACITIES FOR 1,000,000 DOLLARS UNDER THE VIOLATION OF PLAINTIFF 8<sup>th</sup> AND 14<sup>th</sup> AMENDMENT RIGHTS.

38) DEFENDANT Supt. GILMORE IS HOUSED AT SCI-GREENE/175 PROGRESS DRIVE/ WAYNESBURG PA 15370... NUMBER 724.852.2902 / WWW-COR-STATE.PA.US/DEFENDANT IS SUPERINTENDENT/WARDEN OF SCI-GREENE BE REACH MONDAY THROUGH FRIDAY

39) DEFENDANT C.O. COLGAN IS SUE IN HIS INDIVIDUAL CAPACITIES AND OFFICIAL CAPACITIES FOR 1,000,000 DOLLARS UNDER THE VIOLATIONS OF PLAINTIFF 8<sup>th</sup> AND 14<sup>th</sup> AMENDMENT RIGHTS.

- 41) PLAINTIFF INCORPORATES BY REFERENCE PARAGRAPHS 1 THROUGH 40 OF THIS COMPLAINT
- 42) THE EIGHTH AMENDMENT, AS APPLIED TO THE STATES BY THE FOURTEENTH AMENDMENT, PROHIBITS CRUEL AND UNUSUAL PUNISHMENT.
- 43) DEFENDANT'S POLICIES, PRACTICES AND PROCEDURES SYSTEMATICALLY VIOLATE THE EIGHTH AMENDMENT RIGHTS OF PRISONERS WITH MENTAL ILLNESS. SUCH POLICIES, PRACTICES AND PROCEDURES INCLUDE EXCESSIVE FORCE OR ADMONISH ASSAULTIVE AND BATTERY; WITHOUT LIMITATION IN THE SRTU PROGRAM
- 44) CONFINEMENT OF PRISONER IN SCI-GREENE SRTU PROGRAM WITH MENTAL ILLNESSES IS JUST ALONG TERM EXCESSIVE AND AGGRESSIVE DISCRETION ENFORCEMENT TO AN WORSEN CONDITION THEN THE R.H.U'S FOR CONDUCT DIRECTLY ATTRIBUTABLE TO DISTRACT AND DESTROY PLAINTIFF MENTAL ILLNESS.
- 45) RELIEF; TRAIN STAFF MEMBERS TO ASSIST GUIDE HELP AND BE PATIENT WITH SMI INMATES
- 46) RELIEF; TO ADEQUATE SOCIAL SOCIETY ECONOMIC MENTAL HEALTH CARE CONCERN ATTENTION AND CONSIDERATION TO AN SERIOUS MENTAL HEALTH NEED.
- 47) RELIEF, CLINICAL AND REHABILITATIVE STAFF UNDER MENTAL HEALTH TREATMENT AND GUIDANCE PROVIDED THE REQUIRING NEEDS TO BE ASSIGNED PROGRAMMING AT AN MENTAL HEALTH SRTU PROGRAM WORKING WITH SMI/ID MENTAL ILL PATIENTS
- 48) RELIEF. CORRECTIONAL OFFICERS WOULD BE TRAIN TO ESCORT AN INMATE WITHOUT SLAVERY OR SHACKLES AND HANDCUFF AS CONDUCT DAMAGE THE MENTAL CAPACITY TO BE ABSENCE OF AN SMI ID MENTAL HEALTH PATIENT; PROVISIONS OF TREATMENT OR SLAVERY.
- ENDING REPORT
- 49) A PLAINTIFF SUEING UNDER §1983 MUST ALLEGE TWO "ELEMENTS". THAT SOME PERSON HAS DEPRIVED HIM OF A FEDERAL RIGHTS AND THAT "THE PERSON WHO" HAS DEPRIVED HIM OF THAT RIGHT ACTED UNDER COLOR OF STATE OR TERRITORIAL LAW.
- \* PLAINTIFF IS HEREBY VERIFYING TO BE THE ABOVE ENTITLED JEROME JUNIOR WASHINGTON UNDER THE UNITED STATES DECLARED PENALTY OF PERJURY.

JEROME WASHINGTON HV0202  
SCI-GREENE  
175 PROGRESS DRIVE  
WAYNESBURG PA 15370

  
DATE: 2-1-18